

MSF
Meister Seelig & Fein PLLC

APPLICATION GRANTED
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 3/29/23

Moises Lluberes may travel to Houston from April 4, 2023 - April 7, 2023, but must provide Pretrial Services with a detailed travel itinerary including, but not limited to: flights, hotel, location and timing of meeting, etc.

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

Re: *United States v. Moises Lluberes*, 20-cr-493 (VSB)

Dear Judge Broderick:

I write on behalf of defendant Moises Lluberes in the above-referenced matter to respectfully request the temporary modification of his conditions of pretrial release to permit him to travel to Houston, Texas from April 4, 2023 through April 7, 2023 to attend an important in person meeting for his employment.

I have discussed this request with the government and Pretrial Services. Pretrial Services (Officer Piperato) objects, but PTS's objection is based only on the Office's blanket policy to object to overnight travel for any defendant subject to location monitoring. PTS Officer Piperato confirmed, however, that Mr. Lluberes has been fully compliant with his conditions of release throughout his more than two-year period of supervision. The government takes no position on this request, and defers to Pretrial Services.

Respectfully Submitted,

MEISTER SEELIG & FEIN LLP

/s/ IH

Henry E. Mazurek
Ilana Haramati

Counsel for Defendant Moises Lluberes

cc: Counsel of Record (via ECF)